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GSA Federal Acquisition Service

FAS POLICY AND PROCEDURE (PAP) 2021-01**MEMORANDUM FOR ALL FAS ACQUISITION ACTIVITIES**

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SUBJECT: Modernizing Supplier Authorization Through Implementation of the Verified Products Portal (VPP)

1. Purpose. This PAP provides guidance to contracting officers (COs) regarding implementation of new supplier authorization requirements under the Federal Supply Schedule (FSS) program. These requirements apply to products only. They are not applicable to services.

2. Background. The FSS program provides federal, state, and local government buyers access to more than 11 million commercial products and commercial services at volume-discount pricing. A key priority for GSA is to ensure that vendors are authorized by the manufacturer to supply the products they offer under the FSS program, throughout the life of the contract.

Current procedures require individual Letters of Supply for each product manufacturer. This is administratively burdensome both for vendors and FAS's acquisition workforce (AWF). Additionally, these letters provide evidence of a vendor's access to an uninterrupted source of supply, but they don't typically allow GSA to verify whether the vendor is *authorized* to sell a manufacturer's product.

Going forward, implementation of the VPP will automate this verification process to the fullest extent possible, making it simpler, more modern, and more efficient. Implementation will include the following:

- A. Launch of the Verified Products Portal
- B. Updates to the Price Point Plus Portal
- C. Multiple Award Schedule solicitation refresh and mass modification

A summary of each is provided below.

A. Launch of the Verified Products Portal. The VPP is a manufacturer-facing portal containing authoritative product content, including standardized manufacturer names,

part numbers, and specifications. This syndicated content - provided directly by manufacturers and other verified sources - includes images, product videos, and pdf documents for commercial off-the-shelf (COTS) products. VPP data will be used to standardize vendor catalogs, ensuring products across GSA marketplaces are accurately represented. Manufacturer participation in the VPP is voluntary.

In addition to product content, the VPP also captures *supplier authorization information*. Access to this information will enable automated supplier authorization enforcement, reduce the burden on vendors to provide individual Letters of Supply, and lower customer risk of purchasing counterfeit or non-compliant parts.

Supplier authorization and other VPP data most often comes directly from the manufacturer. However, in some instances, this data may instead be provided by a manufacturer's wholesaler, distributor, or other authorized partner. These authorized partners are considered for VPP participation on a case-by-case basis and verified by GSA.

B. Updates to the Price Point Plus Portal. The Price Point Plus Portal, commonly referred to as 4P, provides unlimited access to market research data furnished by GSA's data enrichment service provider, XSB. 4P delivers on-demand market research and analysis that can be used during the pre-award phase to screen the products being offered, as well as post-award to screen pricing modifications and items currently on contract.

New indicators have been added to 4P to address a vendor's supplier authorization status. 4P pulls supplier authorization data directly from the VPP and will display "Authorized," "Unauthorized," or "Requires LOS." This supplier authorization information can also be accessed via the [AWF Verified Products Portal Dashboard](#).

For more information on 4P, see the [4P Application User Guide](#).

C. Multiple Award Schedule Solicitation Refresh and Mass Modification. The Multiple Award Schedule (MAS) solicitation will be refreshed and a mass modification will be distributed to all current contractors, to make changes that facilitate the verification and enforcement of supplier authorization requirements throughout the life of FSS contracts. This will be accomplished via updates to the following:

- FAS provision SCP-FSS-001 *Instructions Applicable to All Offerors*
- FAS clause I-FSS-644 *Products Offered and Sold by Vendors Other Than the Manufacturer* (formerly *Dealers and Suppliers*)
- Letter of Supply Template (solicitation attachment)

3. Effective Date. This PAP is effective upon publication of Refresh 6 to the Multiple Award Schedule solicitation.

4. Termination Date. This PAP terminates when cancelled/moved to “inactive” status in the Acquisition Policy Library.

5. Applicability. This PAP applies to all FAS acquisition activities awarding and administering FSS program contracts. It does not apply to Department of Veterans Affairs acquisition activities.

6. Cancellation. Not applicable.

7. Reference to Regulations/Policy.

- General Services Administration Acquisition Regulation (GSAR)
 - 552.238-79 *Cancellation*
- FAS Clauses/Provisions
 - I-FSS-644 *Products Offered and Sold by Vendors Other Than the Manufacturer* (formerly *Dealers and Suppliers*)
 - SCP-FSS-001 *Instructions Applicable to All Offerors*

8. Instructions/Procedures.

The following instructions and procedures will take you step-by-step through updated supplier authorization requirements. As a reminder, these procedures apply to products only.

Guidance is divided into three sections:

- A. Solicitation Refresh and Mass Modification
- B. Supplier Authorization and Letters of Supply
- C. Removal of Unauthorized Products

A. Solicitation Refresh and Mass Modification.

The MAS solicitation will be refreshed and a mass modification will be distributed in Spring 2021 to incorporate the updates below:

1.) SCP-FSS-001 *Instructions Applicable to All Offerors*.

This provision provides comprehensive instructions for all offerors submitting proposals under the MAS solicitation. Language has been revised to inform offerors that a Letter of Supply is not required if proposed products come from a manufacturer that provides supplier authorization data in the VPP.

See [Attachment #1](#) for the relevant, updated text of this provision.

2.) I-FSS-644 *Products Offered and Sold by Vendors Other Than the Manufacturer* (formerly *Dealers and Suppliers*).

This clause was previously used to communicate the requirement for vendors to submit a Letter of Supply or other evidence of an uninterrupted source of supply. The revised clause outlines updated and expanded supplier authorization and uninterrupted source of supply requirements to be maintained throughout the life of the contract. It has also been renamed to better reflect its overall purpose.

See [Attachment #2](#) for the full text of the revised clause.

3.) Letter of Supply Template.

This template provides minimum standards for vendors needing to provide evidence of an uninterrupted source of supply. The language in this template has been updated to be consistent with the new instructions for offerors in SCP-FSS-001, to reorganize content for better clarity, and to make general updates for the MAS consolidation effort.

See [Attachment #3](#) for the full text of this template.

B. Supplier Authorization and Letters of Supply.

1.) Introduction.

- The following procedures apply to the evaluation of FSS products. This includes -
 - The evaluation of products in new offers, modification requests, and for the exercise of option periods
 - Targeted initiatives to identify unauthorized suppliers (e.g., supply chain Robo-mods)
 - Any time GSA becomes aware of a discrepancy regarding a vendor's authorization program status, a vendor's uninterrupted source of supply, or a manufacturer's prohibition
- The VPP is GSA's official source for verified product data and supplier authorization information. VPP supplier authorization data is authoritative and takes precedence over all other sources of supplier authorization information, to include Letters of Supply.
- The vast majority of VPP supplier authorization data comes directly from the manufacturer of the product. However, VPP data may also be provided by other GSA-verified authorized partners, e.g., wholesalers and distributors. The term

“manufacturer” as used throughout this section refers to the GSA-verified source that has uploaded supplier authorization data to the VPP, whether it’s the manufacturer or an authorized partner.

- All questions regarding the VPP (internal and external, e.g., FAS AWF, vendor, manufacturer, etc.) should be directed to vpp@gsa.gov.

2.) Evaluation Procedures.

When evaluating FSS products, COs are required to do the following -

a. Ensure vendor compliance with requirements for supplier authorization and an uninterrupted source of supply. This can be accomplished either by reviewing a 4P report or by accessing the [AWF Verified Products Portal Dashboard](#). Under Supplier Authorization Status, products will be indicated as “Authorized,” “Unauthorized,” or “Requires LOS.”

i. When a product is indicated as “**Authorized**,” this means -

(1) The manufacturer is a VPP participant and has a **supplier authorization program**:

(a) The manufacturer maintains a supplier authorization program where it can identify all vendors authorized to sell the product.

(b) The manufacturer has uploaded to VPP an exhaustive list of suppliers authorized to sell the product and is required to keep this list current at all times.

(c) This vendor **IS** currently listed by the manufacturer as an authorized supplier and is therefore **authorized** to sell the product.

(2) The manufacturer has confirmed it will provide this vendor with **access to an uninterrupted source of supply sufficient to satisfy the government’s requirements for the product**.

(3) **A Letter of Supply is NOT required for this product**. GSA will rely on VPP data to ensure the vendor maintains its “Authorized” status throughout the life of the contract.

ii. When a product is flagged as “**Unauthorized**,” this means -

(1) One of the following situations applies. Either -

(a) The manufacturer is a VPP participant and maintains a **supplier authorization program**. This vendor has **NOT** been listed by the manufacturer as an authorized supplier and is therefore **NOT authorized** to sell this product.

**** OR ****

(b) The manufacturer is a VPP participant and has indicated it has an **open distribution policy**. Open distribution means that ALL vendors are authorized to sell the product unless expressly identified as *prohibited* by the manufacturer. The manufacturer has expressly identified this vendor as **prohibited** and the vendor is therefore **NOT authorized** to sell this product.

(2) A product flagged as “Unauthorized” **cannot be awarded and must be removed from the new offer, modification request, or contract**. See 8C. *Removal of Unauthorized Products* for further instructions.

(3) If the vendor believes a product has been erroneously flagged as “Unauthorized,” it is the vendor’s responsibility to resolve this issue with the manufacturer. The manufacturer will need to correct the error in the supplier authorization data it uploaded to VPP before the vendor will be accurately reflected in 4P and dashboard reports. Vendors can email vpp@gsa.gov with questions or for more information regarding this process.

iii. When a product is indicated as “**Requires LOS**,” this means -

(1) One of the following situations applies. Either -

(a) The manufacturer is a VPP participant but has an **open distribution policy**:

- The manufacturer does not maintain a supplier authorization program. All vendors are authorized to sell the product unless expressly identified as *prohibited* by the manufacturer. This vendor has not been expressly identified as *prohibited* (prohibited vendors will be flagged as “Unauthorized”). However, since the manufacturer does not individually authorize suppliers, it also **cannot confirm this vendor has access to an uninterrupted source of supply**

sufficient to satisfy the government's requirements for the product.

**** OR ****

(b) The manufacturer does not provide supplier authorization data to the VPP at this time.

(2) A Letter of Supply IS required for this product to demonstrate an uninterrupted source of supply sufficient to satisfy the government's requirements.

b. Be sure to fully document compliance with supplier authorization and Letter of Supply requirements in the contract file, i.e., in the Pre-Negotiation Memorandum or Memo to File, as applicable (templates have been updated to incorporate these new requirements - see the [MAS Solicitation Templates](#) page on the Acquisition Gateway).

At a minimum, this should include -

- i. A description of how supplier authorization and/or an uninterrupted source of supply was confirmed for evaluated products
- ii. A copy of 4P/dashboard supplier authorization results
- iii. A statement that submitted Letters of Supply were reviewed and found to be in compliance with template requirements (if applicable)
- iv. A description of how any "Unauthorized" products were resolved (if applicable)
- v. All relevant correspondence

C. Removal of Unauthorized Products.

1.) A product flagged as "Unauthorized" cannot be awarded and must be removed from the new offer, modification request, or contract.

2.) Removal of an unauthorized product can be accomplished in several different ways, depending on the specifics of the case:

- Vendor withdrawal of the unauthorized product from a new offer or modification request

- Vendor modification request to delete the unauthorized product from an awarded contract
- CO rejection of the unauthorized product in a new offer or modification request
- CO deletion of the unauthorized product from an existing contract

3.) When a product is flagged as “Unauthorized,” follow the process below:

a. For new offers and modification requests.

i. “Unauthorized” products should be treated like any other identified deficiency in a new offer or modification request. The CO can choose to reach out to the vendor for clarification, remove “Unauthorized” products from consideration, or reject the new offer/modification request in its entirety. This is ultimately the CO’s call to make based on the specifics of the new offer or modification request, the extent of flagged supplier authorization issues, and the presence of other identified deficiencies.

b. For existing contracts, to include the exercise of option periods.

i. In accordance with clause I-FSS-644 *Products Offered and Sold by Vendors Other Than the Manufacturer*, notify the vendor and provide 30 calendar days for resolution of the “Unauthorized” product. Sample language is provided in [Attachment #4](#).

ii. The vendor must resolve the “Unauthorized” product within this timeframe by either -

(1) Submitting a modification request to delete the product

**** OR ****

(2) Working with the manufacturer to correct erroneous VPP data so that the product is no longer flagged as “Unauthorized”

iii. If the vendor does not reply or does not otherwise resolve the “Unauthorized” product within this timeframe, the CO may proceed with deletion of the flagged product from the contract. Sample language is provided in [Attachment #5](#).

9. Signature:

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5/4/2021

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Office of Policy and Compliance

Date